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February 10, 2023

VIA ECF

Honorable Cheryl L. Pollak
United States Chief Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: Ramsey Smith v. The City of New York, et. al.,
21-CV-4157 (HG) (CLP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York ("City"), Leo Bonacasa, Ryan Madhoo, and Aleksandar Todoroski in the above-referenced action. Defendants write pursuant to the Court's Order to submit a status letter by February 10, 2023 and to respectfully request that the Court stay the instant matter until May 8th, 2023 because the undersigned has been selected for jury duty. Plaintiff's counsel consents to this request.

By way of background, on July 23, 2021, plaintiff commenced this action pursuant to 42 U.S.C. § 1983 by filing the Complaint. *See* Civil Docket ¶ 1. Plaintiff alleges, *inter alia*, that, on July 15, 2019, pursuant to a warrant, defendants broke down the door to plaintiff's apartment, damaged his lock, damaged his Cartier watch, took approximately \$30,000 but only returned \$11,900, damaged plaintiff's clothing and personal property, opened his bedroom door and closet which was not in plain view, seized alleged marijuana and appurtenances, and wrongfully arrested plaintiff for possession of marijuana. *See* Amended Complaint at ¶ 7. On December 31, 2021, defendant City and Officer Bonacasso filed an Answer to the Complaint. *See* Civil Docket ¶ 12.

On February 9, 2023, the undersigned was selected for grand jury duty and, upon information and belief, will be engaged for three months - from February 14th, 2023 to May 5th,

2023. I am expected to be in Court daily during this time period, during the majority of the work day, and will have limited access to my email. As such, defendants respectfully request that the Court stay the instant matter until May 8th, 2023.

Thank you for your consideration herein.

Respectfully submitted,

A handwritten signature in black ink that reads "Felix De Jesus". The script is cursive and fluid, with the first letters of each word being capitalized and slightly larger than the rest of the letters.

Felix De Jesus
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **VIA ECF**
All attorneys of record